

To: Rodriguez, Joshua (DDOE)[joshua.rodriguez@dc.gov]
Cc: Kelley, Isaac (DDOE)[isaac.kelley@dc.gov]; Gamby, Patricia A WAD[Patricia.A.Gamby@usace.army.mil]; Peterson, John W WAD[John.W.Peterson@usace.army.mil]; Burnett, Caroline (DDOE)[caroline.burnett@dc.gov]; Price-Fay, Michelle[Price-Fay.Michelle@epa.gov]; Seligman, Andrew[Seligman.Andrew@epa.gov]; Shamet, Stefania[Shamet.Stefania@epa.gov]; McGuigan, David[McGuigan.David@epa.gov]; Pilat, David (DDOE)[david.pilat@dc.gov]; McDonnell, Amy (DDOE)[amy.mcdonnell@dc.gov]; Bemis, James K (Jim) NAB[Jim.Bemis@usace.army.mil]; Tesema, Mel M WAD[Mel.M.Tesema@usace.army.mil]; Choudhary, Shabir A WAD[Shabir.A.Choudhary@usace.army.mil]
From: Jacobus, Thomas P WAD
Sent: Mon 12/29/2014 10:39:54 PM
Subject: Dec 29 follow up: NPDES Permit No. DC0000019 Approved Bypass (UNCLASSIFIED)
[GT 2 Anticipated Bypass Request Sep 28 12.pdf](#)
[FFCA Extn till Feb 2012.pdf](#)
[FFCA Modification 30Nov2010.pdf](#)
[Letter approving the authorization of an anticipated by-pass GT basin #2 Oct 26, 2012 \(UNCLASSIFIED\)](#)
[Washington Aqueduct FFCA Final Milestone Extension Request 5 24 10.pdf](#)
[Georgetown Basin 1 and 2 discharges 2008 to Present.docx](#)
[GT Basin 2 TSS December 2014.xlsx](#)
[bypass nov 2014.pdf](#)

Classification: UNCLASSIFIED
Caveats: NONE

Joshua,

I'm sorry to have been delayed getting this response to you. We were engaged with DC Water doing analysis to help determine the water quality in the affected area north of Logan Circle through December 19th and then got further behind Monday through Wednesday of last week. I regret the inconvenience this has caused.

I've attached several documents to this email that lay out the date changes in the FFCA for discharges from Dalecarlia and Georgetown and also document our two requests for anticipated bypasses at Georgetown in 2012 and in 2014.

Washington Aqueduct received two extensions to the FFCA regarding discharges from its sedimentation basins.

The first request and approval extended the discharge from all basins until September 30, 2011.

The second request and approved extended the discharge from the Dalecarlia sedimentation basins unit February 14, 2012. There is a typo in the letter. It says 2011 but from the context it is clear that it is 2012 since EPA was responding to a letter from Washington Aqueduct dated June 20, 2011.

Additionally, in September 2012 Washington Aqueduct received permission to make an anticipated bypass from Basin #2 at Georgetown.

The last request for an anticipated bypass from Basins 1 and 2 at Georgetown was made on September 28, 2014 and approved on November 10, 2014.

Georgetown Basin #2 was drained on November 30, 2014, and cleaned during the first two weeks of December 2014.

I have attached a sheet that details the dates of the Georgetown basin discharges since 2008.

In terms of quantity of sediment produced (and discharged) it would of course depend on the turbidity of the raw water from the Potomac River, but I believe it would be reasonable to take the data I sent earlier on the calculated deposits in Georgetown Basin #2 and conclude that that would have historically been discharged in a similar period of collection in Georgetown Basin #2 and a smaller amount because of the smaller size in Georgetown Basin #1.

Also attached is a spreadsheet with the TSS analysis of the most recent discharge of Georgetown Basin #2. These samples were collected per the agreement in our discussion on December 4, 2014, to collect a representative morning and afternoon sample going to both discharge 003 and 004 while Georgetown Basin #2 cleaning was occurring.

We anticipate draining and cleaning Georgetown Basin #1 starting on Sunday, January 11, 2015. We will send a confirmatory note when we get closer to that date. And during the discharge we will perform the same TSS analysis that we did during the cleaning of Georgetown Basin #2.

Thank you for your patience, and again I apologize for the tardiness of this reply.

Tom J
202-764-0031

-----Original Message-----

From: Rodriguez, Joshua (DDOE) [mailto:joshua.rodriguez@dc.gov]
Sent: Monday, December 29, 2014 2:44 PM
To: Jacobus, Thomas P WAD
Cc: Kelley, Isaac (DDOE); Gamby, Patricia A WAD; Peterson, John W WAD; Burnett, Caroline (DDOE); 'Price-Fay.Michelle@epa.gov'; 'Seligman.Andrew@epa.gov'; 'Shamet.Stefania@epa.gov'; 'McGuigan.David@epa.gov'; Pilat, David (DDOE); McDonnell, Amy (DDOE)
Subject: RE: [EXTERNAL] RE: Tuesday December 9 follow-up: NPDES Permit No. DC0000019
Approved Bypass (UNCLASSIFIED)
Importance: High

Tom,

I trust your holiday break was pleasant. I am inquiring about the information requested by our December 12th email. I understand the delay caused by your assistance with the DC Water issue; however, based on your email below we expected the information on December 19th. According to the WAD, TSS results are expected on a 5-day TAT, it has been 3 weeks and no data has been submitted. Please submit the TSS data for the samples collected as soon as possible.

Additionally, we have been reviewing the WAD's DMR and found that the last reported discharge from Outfall No. 3 was November 2012, which is consistent with the information previously provided regarding the accumulation timeframe; however, according to FFCA extensions documents, an approval was granted for the discharge from Outfall 002 only. Discharges from Outfalls 003 and 004 were still only authorized until September 2011. If this inaccurate and an additional extension was approved please submit the EPA approval.

If there are further questions please let me know.

JOSHUA RODRIGUEZ
BRANCH CHIEF

INSPECTION AND ENFORCEMENT BRANCH

WATER QUALITY DIVISION
JOSHUA.RODRIGUEZ@DC.GOV
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(202) 535-2226 DIRECT

-----Original Message-----

From: Jacobus, Thomas P WAD [mailto:Thomas.P.Jacobus@usace.army.mil]
Sent: Thursday, December 18, 2014 3:03 PM
To: Rodriguez, Joshua (DDOE)
Subject: FW: [EXTERNAL] RE: Tuesday December 9 follow-up: NPDES Permit No. DC0000019
Approved Bypass (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Joshua,

I've assembled all the information you requested and we need to format it for you.

We've been focused on helping DC Water analyze the water distribution system contamination situation near Logan Circle for the last two days. I'll get what you asked for on Friday.

Sorry for the delay.

Tom

-----Original Message-----

From: Jacobus, Thomas P WAD
Sent: Monday, December 15, 2014 3:43 PM
To: 'Rodriguez, Joshua (DDOE)'
Cc: Kelley, Isaac (DDOE); Gamby, Patricia A WAD; Peterson, John W WAD; Burnett, Caroline (DDOE); 'Price-Fay.Michelle@epa.gov'; 'Seligman.Andrew@epa.gov'; 'Shamet.Stefania@epa.gov'; 'McGuigan.David@epa.gov'; Pilat, David (DDOE); McDonnell, Amy (DDOE)
Subject: RE: [EXTERNAL] RE: Tuesday December 9 follow-up: NPDES Permit No. DC0000019
Approved Bypass (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Joshua,

I'll get a complete response to you by Wednesday. I need to ask our engineering and operations staff to check dates of discharges between 2010 and 2012 and I'll provide you the extensions of the Federal Facilities Compliance Agreement dates that permitted discharges to the Potomac while the processing facility was being finished.

Tom

-----Original Message-----

From: Rodriguez, Joshua (DDOE) [mailto:joshua.rodriguez@dc.gov]

Sent: Friday, December 12, 2014 4:01 PM

To: Jacobus, Thomas P WAD

Cc: Kelley, Isaac (DDOE); Gamby, Patricia A WAD; Peterson, John W WAD; Burnett, Caroline (DDOE); 'Price-Fay.Michelle@epa.gov'; 'Seligman.Andrew@epa.gov'; 'Shamet.Stefania@epa.gov'; 'McGuigan.David@epa.gov'; Pilat, David (DDOE); McDonnell, Amy (DDOE)

Subject: [EXTERNAL] RE: Tuesday December 9 follow-up: NPDES Permit No. DC0000019 Approved Bypass (UNCLASSIFIED)

Tom,

Thank you for the update. I have a couple of questions for you regarding the solids accumulation.

The new permit required the WAD to discontinue the discharge of sediment to the Potomac by November 30, 2010. The chart provided only depicts November 2012 through November 2014. Based on the chart approximately 6.5 million pounds of sediment accumulated within the basin over that time period.

*What about the period from November 2010 through November 2012?

*Was the basin cleaned during that period? Were the dredgers fully operational? Based on the chart it appears they did not remove any sediment for a number of months from November 2012 through January 2013.

*If the basin was not cleaned and the dredgers were operating at the same capacity as the period reported, can we assume that approximately another 6.5 million pounds was accumulated for a total of 13 million pounds?

If you need further clarification please let me know.

Thank you and have a nice weekend.

JOSHUA RODRIGUEZ
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-----Original Message-----

From: Jacobus, Thomas P WAD [mailto:Thomas.P.Jacobus@usace.army.mil]

Sent: Tuesday, December 09, 2014 5:41 PM

To: Rodriguez, Joshua (DDOE); Pilat, David (DDOE)

Cc: Kelley, Isaac (DDOE); Gamby, Patricia A WAD; Peterson, John W WAD; Burnett, Caroline (DDOE);

'Price-Fay.Michelle@epa.gov'; 'Seligman.Andrew@epa.gov'; 'Shamet.Stefania@epa.gov';

'McGuigan.David@epa.gov'

Subject: Tuesday December 9 follow-up: NPDES Permit No. DC0000019 Approved Bypass
(UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

This is an update on the cleaning of GT Basin #2.

We will complete the work on this basin on Wednesday.

Samples have been collected in the morning and afternoon on Monday and Tuesday and will be collected again on Wednesday.

We'll send the TSS data to you.

It will sit empty from 11 December through about 22 Dec when we will have finished the work on a valve at the Dalecarlia Reservoir and then we will begin refilling it. Once it is full we will put it in operation and it's stable we will initiate the draining and cleaning of Basin #1 (the one along MacArthur Boulevard).

I'll give you several days notice, but it's likely not to begin before 6 Jan 15.

All of its sediment goes (and only goes) to outfall 004.

Tom

-----Original Message-----

From: Jacobus, Thomas P WAD

Sent: Friday, December 05, 2014 5:24 PM

To: Jacobus, Thomas P WAD; 'Rodriguez, Joshua (DDOE)'; 'Pilat, David (DDOE)'

Cc: 'Kelley, Isaac (DDOE)'; Gamby, Patricia A WAD; Peterson, John W WAD; 'Burnett, Caroline

(DDOE)'; 'Price-Fay.Michelle@epa.gov'; 'Seligman.Andrew@epa.gov'; 'Shamet.Stefania@epa.gov';

'McGuigan.David@epa.gov'

Subject: Friday, December 5 follow-up: NPDES Permit No. DC0000019 Approved Bypass
(UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

This follows up on yesterday's note about processing time for TSS results.

Our lab chief told me that it takes about 5 days. I'll start sending the TSS results as soon as they come out.

I am attaching a diagram that shows the physical locations of outfalls 003 and 004. In addition to what is shown on this diagram, it is possible to drain the "upper portion" of Basin #2 (the part with the clay bottom, not the concrete) to outfall 004. We used that value in addition to the valve that sends water to 004. Samples were collected from a vertical access to the discharge pipe as the pipe left the reservoir. Once in the pipe, the liquid daylighted at the outlet structure and enters the Potomac via the channel from the outlet to the water's edge. The TSS values I send in the next few days will reflect 003 and 004.

When we drain Basin #1, it will all go to outfall 004 and only 004.

I've also attached a diagram showing the calculated accumulation of solids (river sediment plus coagulant) over the last two years when basin #2 was last emptied. On that diagram is the plot of the dredged solids sent to the residuals treatment facility. The cumulative difference shown at the right in the box is the sediment that we estimate we discharged to the Potomac River.

More follow-up for you next week.

Tom J

-----Original Message-----

From: Jacobus, Thomas P WAD

Sent: Thursday, December 04, 2014 4:53 PM

To: 'Rodriguez, Joshua (DDOE)'; Pilat, David (DDOE)

Cc: Kelley, Isaac (DDOE); Gamby, Patricia A WAD; Peterson, John W WAD; Burnett, Caroline (DDOE); 'Price-Fay.Michelle@epa.gov'; 'Seligman.Andrew@epa.gov'; 'Shamet.Stefania@epa.gov'; 'McGuigan.David@epa.gov'

Subject: RE: NPDES Permit No. DC0000019 Approved Bypass (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

I thought it was a very productive conversation yesterday. Thank you.

We did collect two sets of samples today. And we do the analysis in house. I have been in Baltimore all day closed away from communications in a meeting with the Baltimore District Engineer, so I didn't get this note in time to get you an answer on when the analysis can be completed. I'll forward you that tomorrow.

I did stop by the GT sedimentation basins on my way back to Dalecarlia from Baltimore and we have made good progress (and I saw the samples that were collected today).

The concrete bottom section is essentially complete.

We will resume the work in the clay bottom segment on Monday.

If you would like to have someone come out and see that work, I would suggest about 9:00 am on Monday.

We'll confirm that with you first thing on Monday morning.

By the end of the day tomorrow we will have decided on our approach for the timing of the discharge of the smaller basin, and I'll pass that schedule to you.

We are also compiling the data to provide the estimate of the quantity of solids in that basin when we began the discharge on Sunday afternoon.

Tom
202-764-0031

-----Original Message-----

From: Rodriguez, Joshua (DDOE) [mailto:joshua.rodriguez@dc.gov]
Sent: Thursday, December 04, 2014 9:08 AM
To: Jacobus, Thomas P WAD; Pilat, David (DDOE)
Cc: Kelley, Isaac (DDOE); Gamby, Patricia A WAD; Peterson, John W WAD; Burnett, Caroline (DDOE); 'Price-Fay.Michelle@epa.gov'; 'Seligman.Andrew@epa.gov'; 'Shamet.Stefania@epa.gov'; 'McGuigan.David@epa.gov'
Subject: [EXTERNAL] Re: NPDES Permit No. DC0000019 Approved Bypass (UNCLASSIFIED)

Tom,

WQD appreciates your time yesterday to address our concerns with the sediment basin cleaning.

WQD has a couple of questions and requests to elaborate on the TSS sampling requested. We assume that you will be conducting the TSS analysis in house. If not please provide the name of the lab you will be using. Additionally please provide the estimated turn around time for the analysis.

When providing the results of the analysis please include a figure or narrative describing where the samples were collected.

If you have any questions regarding the sampling or other requests please do not hesitate to contact me.
Joshua Rodriguez
Branch Chief

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(202) 535-2226 Direct

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